

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

DEPARTMENT'S FIRST SET OF INFORMATION REQUESTS
TO COVAD COMMUNICATIONS COMPANY
D.T.E. 01-39

Pursuant to 220 C.M.R. 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to parties in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if a party's witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If a party finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve one original copy of the responses on Mary Cottrell, Secretary of the Department, and submit one (1) copy of the responses to the following: Jesse S. Reyes, Hearing Officer; Michael Isenberg, Director, Telecommunications Division; Ashish Shrestha, Analyst; and, Peter Allen, Analyst. In addition, responses are to be transmitted to the foregoing persons by e-mail and to dte.efiling@state.ma.us.
9. Proprietary and confidential materials: Do not submit electronic copies of proprietary or confidential materials by e-mail. Requests for protective treatment of discovery responses must be accompanied by a statement of reasons for protective treatment to be considered by the Department in light of Department precedent and the statutory presumption that such documents are considered to be public information.
10. Responses are due by **January 28, 2002**.

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DTE-CVD-1-1 Please refer to Exhibit A to the Joint Direct Testimony of Valerie Evans and John Fogarty ("Joint Direct Testimony").

- (a) Please describe the method used to determine the information provided in the column entitled "Billing Equates to Tariff."
- (b) For each of the collocation arrangements listed in Exhibit A¹ please provide the following information:
 - (1) What services are provisioned to this collocation arrangement? Are switched access or special access services provisioned to this collocation arrangement?
 - (2) Which rate does Covad assert should apply, and for which dates are the billings in dispute? If the applicable tariff changed after the date that the initial power application was submitted to Verizon, state the relevant dates and the applicable tariff.
 - (3) How many feeds were ordered? Indicate whether this answer refers to A&B feed pairs.
 - (4) Please state the number of drain amps ordered, if drain amps required was specified in any order.
 - (5) Please state the number of fused amps ordered, if fused amps required was specified in any order.

¹ If Covad seeks confidential treatment for its responses to these information requests similar to the treatment requested in its Motion for Confidential Treatment (Nov. 13, 2001) and Further Comments (Dec. 6, 2001), Covad may incorporate that motion by reference in its response, and submit both a proprietary version of its response and a public version that redacts all references to the locations of collocation arrangements and ACNA codes. A protective order will be issued at the conclusion of these proceedings.

- (6) Please state the amount billed by Verizon during the period in dispute.
- (7) Please state the amount that Covad claims should have been billed during the period in dispute.

- DTE-CVD-1-2 Please refer to the Joint Direct Testimony at ¶ 16, where Covad’s witnesses state that “if Covad ordered 40 drained amps on a feed, Verizon would provide two sub-feeds each fused at 60 amps and would bill Covad for 120 amps.”
- (a) In this example, is “feed” a reference to an A&B feed pair?
 - (b) If Covad orders 40 drained amps on a feed, as described in the example above, please describe the manner in which Covad engineers its equipment to draw upon that feed (i.e. state whether the current drawn by the equipment is load-shared between sub-feeds (as the term “sub-feed” is described in the Joint Direct Testimony) or whether one sub-feed is purely a redundant power source, and state how such feeds and sub-feeds should be fused in order to ensure that service is not interrupted).
 - (c) State whether the current drawn by equipment at each collocation arrangement identified in Covad’s response to DTE-CVD-1-1 is load-shared between sub-feeds or whether the other sub-feed is a purely redundant power source.
 - (d) If the current drawn from the sub-feeds is load-shared, state why the equipment is engineered to draw current in that manner.
- DTE-CVD-1-3 List all collocation arrangements in Massachusetts where Covad needed only one sub-feed (e.g. the “A-feed”) or odd numbers of sub-feeds, but was required to order sub-feeds in pairs as a result of the ordering form or any other directions from Verizon.
- DTE-CVD-1-4 If Covad asserts that Tariff 15 applied, or continues to apply, to its DC power orders, please state all facts relied upon to support this.